

UNITED STATES BANKRUPTCY COURT  
for the Eastern District of Pennsylvania

In re	:	Case No. 11 - 18010
Fawwaz F. Beyha	:	(Chapter 11)
Debtor.	:	
	:	Hon. Jean K. FitzSimon
	:	

AFFIDAVIT IN SUPPORT OF DEBTOR'S  
MOTION TO REOPEN CASE

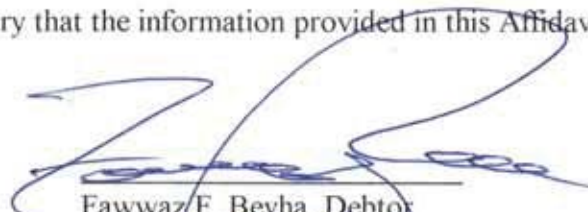
I, Fawwaz F. Beyha, Debtor in the above-case, depose and say that I submit this Affidavit in Support of my Motion to Reopen Case, and, as reasons therefor, states as follows:

1. On July 20, 2010, I acquired title to real property known as 1629 Webster Street Philadelphia, PA 19146 ("Property - 1"), through a Deed recorded on August 5, 2010 in the Office of the Recorder of Deeds of Philadelphia County on Document No. 522447781.
2. On July 20, 2010, I obtained a mortgage from this creditor, Lava Funding, LLC ("Lava"), in the amount of \$280,000.00, and recorded on August 5, 2010 in the Office of the Recorder of Deeds of Philadelphia County on Document No. 52244782.
3. Sometime thereafter, I became delinquent with this mortgage.
4. In an attempt to resolve this matter, I and Lava signed a Deed in Lieu of Foreclosure on March 10, 2011, and recorded on March 11, 2011 in the Office of the Recorder of Deeds of Philadelphia County on Document No. 52324771.
5. Lava provided me with a Satisfaction on June 16, 2011, which has been recorded on July 1, 2011 in the Office of the Recorder of Deeds of Philadelphia County on Document No. 52364276.

6. I also own other real properties in the City of Philadelphia including (a) 1405 South 32<sup>nd</sup> Street Philadelphia, PA 191 ("Property - 2") and (b) 1551 South 16<sup>th</sup> Street Philadelphia, PA 19146 ("Property - 3").
7. Unbeknownst to me, Lava recorded a mortgage dated June 22, 2011 and for \$41,689.50 and without my signature against Property - 2 and Property - 3 (recorded on July 20, 2011 and in the Office of the Recorder of Deeds of Philadelphia County on Document No. 523705260).
8. This June 22, 2011 mortgage conveyance was fraudulent, because it was made without fair consideration and because I did not sign such document.

VERIFICATION

I declare under penalty of perjury that the information provided in this Affidavit is true and correct.

  
Fawwaz F. Beyha, Debtor  
DATE: 3/1/19